

EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

CHRISTOPHER FERGUSON,
individually and on behalf of others
similarly situated,

Plaintiffs,

V.

TEXAS FARM BUREAU BUSINESS CORPORATION, TEXAS FARM BUREAU CASUALTY INSURANCE COMPANY, TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY, TEXAS FARM BUREAU UNDERWRITERS, FARM BUREAU COUNTY MUTUAL INSURANCE COMPANY OF TEXAS, SOUTHERN FARM BUREAU LIFE INSURANCE COMPANY, and TEXAS FARM BUREAU,

Defendants.

CIVIL ACTION NO. 6:17-CV-00111-ADA
COLLECTIVE ACTION

DEFENDANTS' JOINT SECOND AMENDED WITNESS LIST

Defendants Texas Farm Bureau, Texas Farm Bureau Business Corporation, Texas Farm Bureau Casualty Insurance Company, Texas Farm Bureau Mutual Insurance Company, Texas Farm Bureau Underwriters, Farm Bureau County Mutual Insurance Company of Texas (collectively, the “TFB Defendants”), and Southern Farm Bureau Life Insurance Company (“SFB Life”) (collectively, “Defendants”), pursuant to the Court’s March 3, 2024 Sixth Amended Scheduling Order (ECF No. 460), the Seventh Amended Scheduling Order (ECF No. 483), and the date agreed to by the parties, hereby submits this Defendants’ Joint Second Amended Witness List:

No.	Name	Time Estimate	May Call / Will Call
1.	Sloan Brown c/o Barry A. Moscovitz Thompson Coe Cousins & Irons, L.L.P. 700 North Pearl Street, 25th Floor Dallas, Texas 75201 (214) 871-8275	2 hours	Will Call
2.	Justin Ingram c/o Barry A. Moscovitz Thompson Coe Cousins & Irons, L.L.P. 700 North Pearl Street, 25th Floor Dallas, Texas 75201 (214) 871-8275	2 hours	Will Call
3.	Chris Whitney c/o Barry A. Moscovitz Thompson Coe Cousins & Irons, L.L.P. 700 North Pearl Street, 25th Floor Dallas, Texas 75201 (214) 871-8275	2 hours	Will Call
4.	John Parum c/o Barry A. Moscovitz Thompson Coe Cousins & Irons, L.L.P. 700 North Pearl Street, 25th Floor Dallas, Texas 75201 (214) 871-8275	1 hour	Will Call
5.	Dan Hightower c/o Barry A. Moscovitz Thompson Coe Cousins & Irons, L.L.P. 700 North Pearl Street, 25th Floor Dallas, Texas 75201 (214) 871-8275	1 hour	Will Call
6.	Gary Wood c/o Barry A. Moscovitz Thompson Coe Cousins & Irons, L.L.P. 700 North Pearl Street, 25th Floor Dallas, Texas 75201 (214) 871-8275	1 hour	Will Call

7.	Jon Sharp c/o Barry A. Moscovitz Thompson Coe Cousins & Irons, L.L.P. 700 North Pearl Street, 25th Floor Dallas, Texas 75201 (214) 871-8275	1.5 hours	Will Call
8.	Randy Dunn c/o Barry A. Moscovitz Thompson Coe Cousins & Irons, L.L.P. 700 North Pearl Street, 25th Floor Dallas, Texas 75201 (214) 871-8275	45 minutes	Will Call
9.	Jaime Tengwall c/o Barry A. Moscovitz Thompson Coe Cousins & Irons, L.L.P. 700 North Pearl Street, 25th Floor Dallas, Texas 75201 (214) 871-8275	45 minutes	Will Call
10.	Shane Jensen c/o Barry A. Moscovitz Thompson Coe Cousins & Irons, L.L.P. 700 North Pearl Street, 25th Floor Dallas, Texas 75201 (214) 871-8275	20 minutes	May Call
11.	Ernie Csiszar 1579 Kathwood Drive Columbia, South Carolina 29206 (847) 224-2783	1 hour	Will Call
12.	David Hurt c/o Markham Leventhal Carlton Fields P.A. 1025 Jefferson Street, NW Suite 400 West Washington, D.C. 20007-5208 (202) 965-8100	20 minutes	Will Call by Deposition

13.	Will Boyd (in place of Jessica Pitts as Manager of Field Compensation) c/o Markham Leventhal Carlton Fields P.A. 1025 Jefferson Street, NW Suite 400 West Washington, D.C. 20007-5208 (202) 965-8100	15 minutes	May Call
14.	Chris Ferguson	1.5 hours	Will Call
15.	Ashley Girlinghouse (361) 554-9687	40 minutes	Will Call
16.	Roger Havel	30 minutes	May Call
17.	Kimberly Bryson	30 minutes	May Call
18.	Brandon Peek	1.5 hours	Will Call
19.	Brenda Aguilar Williams 1580 State Hwy. 154 W Gilmer, TX 75644-7639 (903) 843-2506	30 minutes	Will Call
20.	Brandon Wheeler	1.5 hours	Will Call
21.	Cade Taylor 2419 N. Hobart St. Pampa, TX 79065 (806) 665-8451	20 minutes	Will Call
22.	David Haynes 2419 N. Hobart St. Pampa, TX 79065 (806) 665-8451	30 minutes	May Call
23.	Randy Kennedy	30 minutes	May Call
24.	Tonya Hinson (806) 665-8451	40 minutes	May Call
25.	Connie Lovelady	1 hour	Will Call
26.	Brenda Halbrook	20 minutes	May Call
27.	Darrell Beakley	1.5 hour	Will Call
28.	Dylan Powell 325 S State Hwy. 46 Seguin, TX 78155-7506 (830) 379-4456	20 minutes	May Call

29.	Rich Rudisaile 240 E. FM 78 Cibolo, TX 78108 (210) 659-5252	20 minutes	Will Call
30.	Ylenna Burgoon (830) 556-0176	30 minutes	Will Call
31.	Daryl Blackwell	1.5 hour	Will Call
32.	David Henry	1.5 hour	Will Cal
33.	Sabrina Baker 14971 State Highway 150 W Coldspring, Texas 77331 (936) 653-4111	30 minutes	Will Call
34.	Dallas Hatton 2420 US Highway 69 S Woodville, Texas 75979-6191 (409) 283-2424	30 minutes	Will Call
35.	Lloyd McCord	1.5 hour	Will Call
36.	Nancy Sparks 215 W. Sammy Baugh Ave. Rotan, TX 79546-4616 (325) 735-3675	30 minutes	Will Call
37.	Mary Pearson 2066 U.S. Hwy. 277 N Anson, TX 79501-2300 (325) 823-3244	30 minutes	Will Call
38.	Matt Stanton	1 hour	Will Call
39.	Joan Day 412 Burlington Ave. Spur, TX 79370 (806) 271-3231	30 minutes	Will Call
40.	Vicki Moore Abell 610 Tilford Ave. Ralls, TX 79357 (806) 253-2564	30 minutes	Will Call
41.	Mike Cook	1.5 hours	Will Call
42.	Joe Rivera, Jr. 525 E. 1st St. Dumas, TX 79029-3219 (806) 935-5633	30 minutes	Will Call

43.	Irma Madrigal 525 E. 1st St. Dumas, TX 79029-3219 (806) 935-5633	30 minutes	Will Call
44.	Brenda Martin 104 N. Main St. Stinnett, TX 79083 (806) 878-3040	20 minutes	May Call
45.	Ricky Martin	1.5 hours	Will Call
46.	John Brown, Jr. 1205 E. 11th Place Big Spring, TX 79720-4801 (432) 267-7466	30 minutes	Will Call
47.	Scott Landreth 3402 S. Treadaway Blvd. Abilene, TX 79602 (325) 692-1213	20 minutes	Will Call
48.	Shannon Gannaway 3402 S. Treadaway Blvd. Abilene, TX 79602 (325) 692-1213	20 minutes	May Call
49.	Denorah Torres (325) 513-5033	20 minutes	Will Call
50.	Gary Clements	1 hour	Will Call
51.	Record Custodians for Plaintiffs' Accountants		May Call

Defendants reserve the right to call (i) any witness identified by any other party in its trial witness list, (ii) any custodian of records, (iii) additional witnesses based upon the evidence by Plaintiffs at trial or identified by Plaintiffs in their trial witness list, and (iv) other rebuttal and/or impeachment witnesses.

Dated: August 5, 2024

Respectfully submitted,

/s/ Markham R. Leventhal

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Underwriters, and Farm Bureau County
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 5, 2024, the foregoing was served on all counsel of record via the ECF filing system.

/s/ Barry Moscovitz

Barry Moscovitz